

PRIVACY POLICY

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INTRODUCTION

Thank you for visiting EspGate website. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at sara@espgate.fi

When you visit our website www.espgate.fi and use our services, you trust us with your personal information. We take your privacy very seriously. This privacy policy explains how EspGate uses the personal data we collect from you when you use our website. This Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared and/or collect in www.espgate.fi. This policy is not applicable to any information collected offline or via channels other than this website

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1. WHAT DATA DO WE COLLECT AND HOW?

Personal information you disclose to us

We collect personal information that you voluntarily provide to us when you use our contact form or select visiting our social media sites using the links from our webpage or otherwise contact us with the call or e-mail options available in our website. The personal information that we collect depends on the context of your interactions with us and can include the following: first and last name, email address, phone number, and other similar contact data you provide us with through our contact form.

Comments: When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

Media: If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

Information automatically collected

We automatically collect certain information when you visit, use or navigate the Sites. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

We also collect information through cookies. You can find additional information about our Cookie Policy in our website.

Information collected from other Sources

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook), as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

2. HOW DO WE USE YOUR DATA?

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent

- **To process and manage your orders or manage your account**
- **To contact you with special offers** on other products and services we think you might like.
- **To send administrative information to you** [for Business Purposes, Legal Reasons and/or possibly Contractual]. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To Request Feedback** [for our Business Purposes and/or with your Consent]. We may use your information to request feedback and to contact you about your use of our Sites.
- **To protect our Sites** [for Business Purposes and/or Legal Reasons]. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- **To enable user-to-user communications** [with your consent]. We may use your information in order to enable user-to-user communications with each user's consent.
- **To enforce our terms, conditions and policies** [for Business Purposes, Legal Reasons and/or possibly Contractual].
- **To respond to legal requests and prevent harm** [for Legal Reasons]. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations. Visitor comments may be checked through an automated spam detection service.

We only share and disclose your information in the following situations:

- **Compliance with Laws.** *We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).*
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third-Party Advertisers.** *We may use third-party advertising companies to serve ads when you visit the Sites. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you*
- **Business Partners.** *We may share your information with our business partners to offer you certain products, services or promotions.*
- **With your Consent.** *We may disclose your personal information for any other purpose only with your consent.*
- **Other Users.** *When you share personal information (for example, by posting comments, contributions or other content to the Site) or otherwise interact with public areas of the site such personal information may be viewed by all users and may be publicly distributed outside the Site in perpetuity. [If you interact with other users of our Sites and register through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and*

descriptions of your activity.] Similarly, other users will be able to view descriptions of your activity, communicate with you within our Sites, and view your profile.

4. HOW DO WE STORE YOUR DATA?

- EspGate will keep your data in the company register of customers. The register is kept in the company database and is only accessed by EspGage company members. The register is updated regularly and the person responsible for this register is Sara Martínez (sara@espgate.fi).
- We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.
- We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our site is at your own risk. You should only access the services within a secure environment.
- We do not knowingly solicit data from or market to children under 18 years of age. By using our Website, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us.

5. MARKETING

- EspGate would like to send you information about products and services of ours that we think you might like, as well as those of our partner companies if you have agreed to receive marketing. You have the right at any time to stop our Company from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact sara@espgate.fi

6. WHAT ARE YOUR DATA PROTECTION RIGHTS?

EspGate would like to make sure you are fully aware of all of your data protection rights.

- **The right to access-** you have the right to request our Company for copies of your personal data. WE may charge you a small fee for this service.
- **The right to rectification-** you have the right to request that our Company corrects any information you believe is inaccurate. You also have the right to request our Company to complete information you believe is incomplete.
- **The right to erase –** You have the right to request that our Company erase your personal data, under certain conditions.

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- **The right to restrict processing** – you have the right to request that our Company restrict the processing of your personal data, under certain conditions.
 - **The right to object to processing** – You have the right to request that our Company transfer the data that we have collected to another organization, or directly to you under certain conditions.
 - If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at or email us: Call us at +358400727145 Or e-mail us: sara@espgate.fi

7. WHAT ARE COOKIES?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our website, we may collect information from you automatically through cookies or similar technology. For further information, visit allaboutcookies.org.

8. HOW DO WE USE COOKIES AND WHAT TYPES OF COOKIES DO WE USE?

EspGate uses cookies in a range of ways to improve your experience on our website including functionality, understanding how you use our website and advertising.

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year. For further information about our cookies, please visit our Cookie Policy also available in this website.

9. HOW TO MANAGE YOUR COOKIES?

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, some of our website features may not function as a result.

10. PRIVACY POLICIES OF OTHER WEBSITES

Our Company website may contain advertisements from third parties not affiliated with us or links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy. We cannot guarantee the safety and privacy of data you provide to any

third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Sites. You should review the policies of such third parties and contact them directly to respond to your questions.

11. CHANGES TO OUR PRIVACY POLICY

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, the data we hold on you , or you would like to exercise one of your data protection rights, please do not hesitate to contact Sara Martínez: sara@espgate.fi tel: +358400727145